



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 5**  
**77 WEST JACKSON BOULEVARD**  
**CHICAGO, IL 60604-3590**

**VIA ELECTRONIC MAIL**  
**DELIVERY RECEIPT REQUESTED**

Jack Mackin  
VP, Operations  
[jmackin@equitransmidstream.com](mailto:jmackin@equitransmidstream.com)

Re: Finding of Violation  
Equitrans Midstream Corporation  
Ohio

Dear Mr. Mackin:

The U.S. Environmental Protection Agency is issuing the enclosed Finding of Violation (FOV) to Equitrans Midstream (you) under Section 113(a) of the Clean Air Act, 42 U.S.C. § 7413(a). We find that you have violated the New Source Performance Standards (NSPS) for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 (Subpart OOOOa) at no fewer than 10 of your Ohio facilities.

Section 113 of the Clean Air Act gives us several enforcement options. These options include issuing an administrative compliance order, issuing an administrative penalty order and bringing a judicial civil or criminal action.

We are offering you an opportunity to confer with us about the violations alleged in the FOV. The conference will give you an opportunity to present information on the specific findings of violation, any efforts you have taken to comply and the steps you will take to prevent future violations. In addition, in order to make the conference more productive, we encourage you to submit to us information responsive to the FOV prior to the conference date.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The EPA contact in this matter is Natalie Topinka. You may contact her at (312) 886-3853 or [topinka.natalie@epa.gov](mailto:topinka.natalie@epa.gov) to request a conference. You should make the request within 10 calendar days following receipt of this letter. We should hold any conference within 30 calendar days following receipt of this letter.

Sincerely,

Nathan A. Frank  
Chief, Air Enforcement and Compliance Assurance Section (IL/IN)

Enclosure

cc: Anthony Koulianos  
Equitrans Midstream Co.  
[akoulianos@equitransmidstream.com](mailto:akoulianos@equitransmidstream.com)

Bob Hodanbosi, Chief  
Division of Air Pollution Control  
Ohio Environmental Protection Agency  
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James Kavalec, Environmental Manager  
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Devan Roof, Manager  
Southeast District Office  
Ohio Environmental Protection Agency  
[devan.roof@epa.ohio.gov](mailto:devan.roof@epa.ohio.gov)

IN THE MATTER OF:	)	
	)	
<b>Equitrans Midstream Corporation</b>	)	<b>FINDING OF VIOLATION</b>
<b>Ohio</b>	)	
	)	<b>EPA-5-22-OH-02</b>
Proceedings Pursuant to	)	
the Clean Air Act,	)	
42 U.S.C. §§ 7401 et seq.	)	
	)	

The U.S. Environmental Protection Agency finds that Equitrans Midstream Corporation (Equitrans) has violated Section 111(e) of the Clean Air Act, 42 U.S.C. § 7411(e). Specifically, Equitrans has violated the Standards of Performance (NSPS) for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015, at 40 C.F.R. Part 60, Subpart OOOOa as follows:

## NSPS Subpart 0000a

- 1

## **Facility Information**

6. Equitrans owns and operates the natural gas compressor station facilities (“the Facilities”) listed in the column titled “Facility Site Name” of Attachment A.

7. These Facilities, listed in Attachment A, are part of natural gas production and processing, which includes the well and extends to, but does not include, the point of custody transfer to the natural gas transmission and storage segment and were constructed after September 18, 2015. Specifically, the Facilities are at locations other than at a natural gas processing plant.

8. The Facilities are within the definitions of crude oil and natural gas production source categories under 40 C.F.R. § 60.5430a.

9. The Facilities include pneumatic controllers, which are affected facilities and are therefore subject to Subpart OOOOa.

10. On October 29, 2021, Equitrans submitted the annual report required by 40 C.F.R. § 60.5420a(b). In this submittal, Equitrans reported to EPA that the pneumatic controllers listed in the column titled “Pneumatic Controller ID” of Attachment A had not met the bleed rate requirements in Subpart OOOOa.

11. In follow-up correspondence with EPA on January 18, 2022, Equitrans confirmed that, prior to conversion to air-driven or low-bleed, each pneumatic controller listed in Attachment A had a bleed rate greater than 6 scf/hr.

12. Equitrans did not claim, under 40 C.F.R. § 60.5390a(a), an exemption to the natural gas bleed rate required by 40 C.F.R. § 60.5390a(b)(1) or (c)(1) due to functional needs for any pneumatic controller listed in Attachment A. EPA knows of no determination by Equitrans that the use of a pneumatic controller affected facility with a bleed rate of greater than the applicable standard is required based on functional needs.

## **Violations**

13. For the time period between the date of initial installation and modification to air-driven or low-bleed, Equitrans operated the pneumatic controller affected facilities listed in Attachment A, at locations other than at a natural gas processing plant, with bleed rates greater than 6 scf/hr, in violation of 40 C.F.R. § 60.5390a(c)(1).

## **Environmental Impact of Violations**

14. These violations have caused or can cause excess emissions of:

**Volatile Organic Compounds (VOC):** VOC emissions contribute to the formation of ground-level ozone. Breathing ozone contributes to a variety of health problems including chest pain, coughing, throat irritation, and congestion. It can worsen bronchitis, emphysema, and asthma, and can reduce lung function and inflame lung tissue. Repeated exposure may permanently scar lung tissue.

Methane: Methane is a potent greenhouse gas, and emissions of methane contribute to climate change.

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Michael D. Harris  
Division Director  
Enforcement and Compliance Assurance Division